

DNR / PEI FILE EXCHANGE NOTES

July 20, 2005

Attendees:

Verne Schrunck – DNR

Ken McFadden – PEI

• POLICY/GUIDANCE AND/OR JUDGMENT ISSUES:

7LTJ53, Former Art's Sinclair, Bussey, RT2 and Overexcavation, P5, (H2N reclass) recommend reject, soil plume /soil source submergence issues, report format issues - post OE (Rev-MH, QA-KM). (Expedite review request-KL)

Selected section as presented in the draft RP letter:

1. **For DNR Review:** The “no action required” site risk classification is not accepted. Refer to subsequent deficiencies #2 and #3 below, and ‘Do Not Require’ issue #1. At minimum, the site is low risk for the Soil Vapor-Potential Confined Space Residential pathway. Be advised, pending a second post-overexcavation groundwater sampling event, the site technically retains its previous high risk classification due to the accepted 2001 Revised Tier 2 containing the following high risk pathways: Groundwater-Nondrinking Water Well, Groundwater Vapor to Enclosed Space, Groundwater-Plastic Water Line, and Soil Leaching-Plastic Water Line. The department strongly encourages and advises your CGP to thoroughly review the department’s Groundwater Professional Bulletin Board posting “Overexcavations, Oxygen Releasing Compound and SMR Submittals” dated 6-28-04 prior to completing the next High Risk Remediation SMR.
2. **For DNR Review:** The Tier 2 Soil Vapor Receptor Summary Table reclassification of the Soil Vapor-Potential Confined Space Residential pathway from “low” to a Current Risk of ‘N’ is not accepted. The department acknowledges your CGP’s explanations (“the soil source has been continually submerged...”) p. 7A and 20, but does not accept the explanation or reason. It has not been demonstrated that the *entire soil contamination plume* exceeding the applicable target levels (1.16 ppm) is submerged. Be advised that the following is considered necessary to demonstrate that the soil contaminant plume (not just the soil source/maximum) is continually submerged: further definition of the *vertical and horizontal extent* of the soil plume to the applicable target levels (through laboratory analysis of additional soil samples). Refer to the Groundwater Professional Bulletin Board posting dated 5-23-00 for additional information.

Furthermore, it has not been demonstrated that groundwater is not likely to fluctuate exposing the soil source/plume (defined to the applicable target level of 1.16 ppm). Examination of historical static water levels and soil sample elevations (pp. 10-11) indicates that the entire soil contamination plume may not be continually submerged. Groundwater elevations have been *within approximately one foot* of the shallowest depth corresponding to a soil sample (BH-10/MW-10) that exceeded the applicable benzene target level and have exposed soil documented with PID readings ranging from 10.5mu to 276mu from 3’ to 8’ bg (refer to BH-10/MW-10 borelog). **Either evaluate the Soil Vapor to Enclosed Space (SVES) pathways using standard Tier 2 procedures (i.e. software); or provide adequate justification that the soil contaminant plume is submerged and groundwater level fluctuations will not likely expose the plume.**

NOTE: If SVES pathways are evaluated using standard Tier 2 procedures, be aware that a soil gas monitoring plan (p. 22) is required for low risk soil vapor receptors regardless of whether the soil contaminant source is submerged.

3. **Note to DNR:** The last HR Interim SMR received 9-29-03 listed the following HR receptors in the SMR GW Receptor Summary Table: ASSR-4, PWL’s 1-4 and 7-11; PCS/PSS were LR. **For DNR Review:** Site reclassification to ‘no action required’ is questioned and not accepted. At least two groundwater monitoring events (post-overexcavation/6 months apart) are required before the department will consider a request for site reclassification to no action required. To date, only one groundwater sampling event has taken place approximately one year post-overexcavation. The department is therefore requiring one additional round of groundwater sampling

in accordance with the accepted Tier 2 SCR Groundwater Monitoring Plan. Groundwater Ingestion, Groundwater Vapor-Enclosed Space, and Groundwater-Plastic Water Line high risk receptors exist in addition to high risk Soil Leaching receptors. (Note: the request for reclassification should be made through submittal of an SMR. Please refer to the Groundwater Professional Bulletin Board posting dated 6-28-04 pertaining to "Overexcavations, Oxygen Releasing Compound and SMR Submittals" for more information. Also refer to 'Do Not Require' section, issue #1.)

The following additional problems do **NOT** require correction in this report, but are identified below for the attention and benefit of your consultant.

1. **For DNR Review:** The report format selected (Revised Tier 2) is inappropriate and unacceptable considering site history events, pathways and receptors (e.g. accepted high risk in 2001(GW Ingestion, GW Vapor to Enclosed Space, GW-Plastic Water Line; Soil Leaching-GW Ingestion and Soil Leaching-Plastic Water Line: high risk, Soil Vapor to Enclosed Space: low risk)) and the overexcavation performed to address the high risk Soil Leaching and high risk Groundwater pathways. As such, a SMR (High Risk Remediation) with post-overexcavation groundwater data entered in the SMR module along with the previous '02 and '03 SMR groundwater data should have been submitted. SMR groundwater data and post-overexcavation groundwater data should not have been moved to the Tier 2 Groundwater Analytical Data Table. Refer to the Groundwater Professional Bulletin Board posting dated 6-28-04 for details. Ensure the next submittal is in the SMR format, with previously accepted Revised Tier 2 groundwater data through '01 in the Tier 2 software module, and '02, '03 and post-overexcavation groundwater data in the SMR module to ensure proper and appropriate evaluation of previously classified high risk Groundwater pathways and receptors (e.g. Nondrinking Water Wells, Vapor to Enclosed Space, and Plastic Water Lines). Additionally, refer to Item #2 listed below.

Refer to file deliverables and draft RP letter for additional text, issues and def's. Additionally....

For DNR Review: However, be advised due to chronic noncompliance with previously established deadlines, the department is unlikely to consider, entertain or accommodate any additional delays or extension requests.

8LTH19, Maintenance Facility, Coralville, RT2 HR (3rd) 1st teleconference occurred 1/14/05, with 1/18/05 DNR letter outlining tasks, 2nd teleconference was canceled as a NAR site classification had been anticipated. Due to site specifics and continued HR site classification, placed in a (modified) teleconference letter format (Rev-TG, QA-KM).

Selected section as presented in the draft RP letter:

This letter is in response to the receipt of the revised (third) Tier 2 Site Cleanup Report (Tier 2 SCR) for the referenced site. Thank you for the submittal. Tier 2 reports classifying the site as high risk were previously accepted (5/25/01, and 6/18/04 department letters). **FOR DNR REVIEW:** As a result of the 1/14/05 teleconference, summarized in the department's 1/18/05 letter (specifically items #1, #4 and #5), the current Tier 2 report includes soil source re-sampling results, analytical results from new monitoring wells, and documentation of plastic water line replacement. The revised Tier 2 report recommends the site remain classified high risk. We have conducted a completeness review of the report as described in subrule 567--135.10(11) of the Iowa Administrative Code. A Tier 2 SCR/SMR is considered to be complete if it contains all the information and data required by the department's administrative rules and guidance regarding Tier 2 evaluations and reporting. Based on our review, the deficiencies listed in the 6/18/04 review letter have not been adequately addressed. However, we are accepting the Tier 2 report for the purpose of completeness and are relying on (your CGP) for accuracy and compliance with the department's rules and guidance. The site is classified as **high risk**. In a 4/26/05 e-mail, a

second teleconference scheduled for 5/3/05 was canceled because the forthcoming revised T2 report anticipated the site would be reclassified NAR. However, NAR was not achieved.

The DNR welcomes the opportunity to discuss the site classification and how site reclassification of your site may be obtained. In an effort to facilitate corrective action activities, the DNR has scheduled a teleconference for **DATE**. If you are unable to participate in the teleconference please inform the DNR as soon as possible.

Refer to file deliverables and draft RP letter for additional text and def's.

8LTH48, Former Coastal Mart, Cedar Rapids, RT2, HR, recommend reject, site classification contingent on soil gas plume definition. (Rev-KP, QA-KM).

Selected section as presented in the draft RP letter:

Note to DNR: "Teleconference" letter format was considered. However, site risk classification is contingent upon and pending soil gas plume definition (refer to subsequent deficiencies #1, #2, #3 and #4).

1. **For DNR review:** The current risk classification for ASSNR receptors presented in the Tier 2 Receptor Summary tables (pp. 7A-8) and in the Risk Justification section is questioned. Risk determination for the ASSNR receptors appears incomplete. Refer to deficiencies #2 and #3 below.
2. **For DNR review:** The current risk classification of "H" for ASSNR receptors presented in the Soil Leaching Tier 2 Receptor Summary table (p. 8) and described as high risk in the Risk Justification section (Soil Leaching and Soil Vapor subsections) is questioned. The department acknowledges soil gas failed at SG-2RR (3/11/05). Soil and groundwater target levels at SG-2RR location are not exceeded. Therefore, soil gas plume definition appears warranted and necessary prior to assigning risk classification to actual vapor receptors. Please define the soil gas plume. Evaluate any actual vapor receptors within the defined soil gas plume as necessary. Revise all affected Tier 2 sections.
3. **For DNR review:** The current risk classification for ASSNR receptors is presented as "N" in the Soil Vapor/Soil to PWL Tier 2 Receptor Summary table (p. 7A). This is not consistent with the high risk classification for the Soil Vapor to Enclosed Space pathway described in the Risk Justification section (p. 20). Please clarify. Revise as necessary. Refer to deficiency #2.
4. The Soil Gas Plume map (Attachment 20) is incomplete. Soil gas plume was not defined and is required for receptor and site risk classification. Refer to previous deficiencies #1, #2 and #3.
5. **For DNR review:** The Soil Gas Monitoring Plan section is questioned. SG-1 is listed as required for annual soil gas monitoring. The Groundwater Vapor to Enclosed Space pathway was classified as NAR through soil gas sampling at SG-1 in the original Tier 2 evaluation. The department acknowledges subsequent free product discovery at MW-5 (groundwater source) and soil gas sampling conducted on 5/4/05 (passing results). Additional soil gas sample at SG-1 is not required. Please revise the soil gas monitoring plan and table.

Refer to file deliverables and draft RP letter for additional text and def's.